

**ADDENDUM TO THE FACT SHEET
FOR NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA-000297-6**

1. GENERAL INFORMATION

Facility: KB Alloys, Inc.
4400 Kawecki Road
Malaga, WA 98828

2. APPLICATION REVIEW

An application for permit reissuance was received by the Department of Ecology (Department) on September 22, 2004, and accepted by the Department on the same day. The scope and manner of any review of an application for reauthorization of a permit by the Department shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; nature, content, and frequencies of permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for permit renewal was reviewed and indicates that no major changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

3. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to KB Alloys for the discharge of wastewater to the Columbia River. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet

addressed conditions and issues at the facility at the time the previous permit was issued, and statements made reflected the status in 2000.

A. Wastewater Characterization

Since the issuance of the current permit, the Department has not received any information which indicates that environmental impacts from the discharge that were not evaluated at the time of the last permit issuance is persuasive enough to undertake a complete renewal of the permit. To illustrate the quality of the company's discharge, the following table contains a comparison of discharge characteristics from 1998 and 2004. The applicable effluent limitations are provided for context.

Comparison of Wastewater Characterizations for 1998 and 2004

Parameter	1998 Characterization		2004 Characterization		Effluent Limitations	
	Average Annual	Maximum Daily	Average Annual	Maximum Daily	Average Monthly	Maximum Daily
Flow, in MGD	0.13	0.16	0.198	0.323	0.30	0.30
Total Suspended Solids, in lbs/day	1.24	1.55	1.92	2.51	4.28	9.00
Oil & Grease, in lbs/day	0.77	2.13	3.35	8.71	2.63	4.39
Temperature, in °C	22.0	35.1	20.3	31.3	NA ¹	27.0 ² 44.5 ³
Fluoride, in lbs/day	0.61	0.97	0.97	1.18	NA ⁴	7.00
Boron, in lbs/day	0.14	0.29	⁵	⁵	2.18	5.20
Aluminum, in lbs/day	0.20	0.35	0.31	0.937	0.704	1.41
Chromium, in lbs/day	0.01	0.01	0.01	0.01	0.04	0.10
Copper, in lbs/day	0.00	0.00	0.016	0.025	0.04	0.094
Zinc, in lbs/day	0.027	0.036	0.038	0.05	0.134	0.321

Each 'Annual Average' value is the average of the reported values for the parameter during the calendar year.

Each 'Daily Maximum' value is the single highest reported value for the parameter during the calendar year.

1-No average monthly limit specified for temperature.

2-Maximum average limit throughout the day.

3-Instaneous limit.

4-No average monthly limit specified for fluoride.

5-No data; monitoring for boron was discontinued during the existing permit cycle.

The permittee has been in substantial compliance during the existing permit cycle. Although the discharge loadings of many of the regulated parameters increased from 1998 to 2004, most loadings are well below the effluent limits. However, on occasion, exceedances of the effluent limitations occur for very limited durations, usually for a single day or hours. The causes for exceedances include extraordinary environmental conditions, rare mechanical breakdowns and the stringency of the technology-based limits. For example, the maximum daily flow limit of 0.3 MGD was exceeded for one day in August 2004 because the high ambient air temperature required the permittee's cooling systems to be operated at a higher rate. In another situation, which occurred in March 2003, the instantaneous temperature limit was exceeded for two days because the outfall pipe was blocked and the discharge pooled in the outfall shed and was heated by the motor. Approximately once a year, the extremely stringent O&G maximum daily limit of 4.39 lbs/day is exceeded; assuming a flow of 0.3 MGD, a concentration of only 1.76 mg/L of O&G will cause an exceedance of the effluent limit. There were *no* exceedances of the effluent limits for metals during 2003 or 2004. There were 3 exceedances of the pH effluent limits 2003 and 2004; the Department considers this a good accomplishment considering pH is continuously recorded.

Despite these rare instances of noncompliance, the Department considers the permittee to be in substantial compliance with the requirements of the existing permit. The permittee's diligence in complying with the permit is partially demonstrated by the fact that, although the permit requires quarterly monitoring for most metals parameters, the company has consistently sampled these parameters monthly for more than five years. In addition, whenever the problematic O&G limit is exceeded, the company samples weekly for the following four weeks to confirm the problem is not ongoing. For these reasons, Special Conditions S1 (effluent limitations) and S2 (monitoring schedule) in the reauthorized permit are carried over unchanged to this reauthorized permit.

B. Submittals Required by the Existing Permit

The existing permit required submittal of three documents to the Department: an engineering report, a spill plan and an outfall evaluation. The engineering report (Special Condition S4) was required to correct the company's practice of discharging laboratory wastewater to an onsite drainfield. Briefly, the permittee's two onsite laboratories analyze product to assure the metals content conforms with the customer's specifications. This issue is more fully described in the attached fact sheet, beginning on page 27. The Department has reviewed and approved the engineering report. The approved solution is to dispose of wastewater through a licensed hazardous waste contractor and modify pipes to discharge the rinse water to the Columbia River through the main outfall pipe.

According to the engineering report, the rinse water volume to be discharged to the river is estimated at 17 gallons per day. Due to the small volume of rinse water, the addition of laboratory wastewater to the existing river discharge is not expected to measurably change the discharge characteristics; consequently, the effluent limits in the proposed permit remain unchanged from the existing permit. The modification will be implemented during the Summer of 2005.

Concerning the spill plan update and outfall evaluation submittals, the Department has reviewed and accepted these documents. The proposed permit contains a routine requirement for the permittee to submit an update to the spill plan with the next application for permit renewal, or if chemical storage circumstances change, whichever occurs first. The proposed permit does not retain the requirement for an outfall evaluation because this evaluation is generally required at ten year intervals.

C. Conclusion

The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next 5 year cycle. For the reasons described in the preceding paragraphs, assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were removed from the draft permit. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. The

Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A -- Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B -- Response to Comments.

4. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for 5 years.

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on July 15, 2004, in the Wenatchee World to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft (PNOD) on April 11, 2005 in the Wenatchee World to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Central Regional Office
15 W. Yakima Avenue, Suite 200
Yakima, WA 98902

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at 509/457-7105, or by writing to the address listed above.

APPENDIX B -- RESPONSE TO COMMENTS

No comments were received by the Department of Ecology.